

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

)

) Chapter 11

)

) Case No. 25-10068 (CTG)

)

) (Jointly Administered)

)

) Hearing Date: Feb. 11, 2025 at 2:00 p.m.

_) Related to Docket Nos. 6, 106, 308

JOINDER OF GRANITE VILLAGE WEST, L.P. AND LYNNWOOD TOWER, LLC, IN LIMITED OBJECTION OF MULTIPLE LANDLORDS TO DEBTORS' MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING THE DEBTORS TO USE CASH COLLATERAL, (II) GRANTING ADEQUATE PROTECTION TO PREPETITION SECURED CREDITORS, (III) MODIFYING THE AUTOMATIC STAY, (IV) SCHEDULING A FINAL HEARING, AND (V) GRANTING RELATED RELIEF

Granite Village West, L.P., as owner of Village West shopping center and Lynnwood Tower, LLC, as owner of Lynnwood Center (collectively “Landlords”) hereby join in the Limited Objection (D.I. 308) filed by ARC CLORLFL001, LLC; ARC NLLKLFL001, LLC; ARC SMWMBFL001, LLC; ARG JAFPTIL001, LLC; ARG MHMORNC001, LLC; ARG OTOWEKY001, LLC; Acadia Realty Limited Partnership; American Fork SC, LLC; BMA JC LLC; Brixmor Operating Partnership LP; CCA-RSSC LLC; EDENS; Federal Realty OP LP; Gallatin Mall Group, L.L.C.; Hutensky Capital Partners, LLC; La Costa Capital Partners; Lancaster Development Company LLC; Marketplace West Partners, LLC; Orem Family Center, LLC; PBA II, LLC; Pride Center Co., LLC; RD Management, LLC; Renaissance Partners I, LLC; Santa Susana GRF2, LLC; Sherman Commons, L.P., Shopping Center Associates, LP; TPP 217 Taylorsville, LLC; The Sterling Organization; UFPTFC, LLC & BBTFC LLC; and Westford Valley Marketplace, Inc., to the *Motion of Debtors for Entry of Interim and Final Orders (I)*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (the “Cash Collateral Motion”) [D.I. 6] for the reasons stated in the Limited Objection, and join, as if restated herein, in all other objections to the Cash Collateral Motion filed by interested parties to the extent such objections are consistent with the Limited Objection.

WHEREFORE, Landlords respectfully request that the relief requested by Debtors be modified as set forth in the Limited Objection and for such further relief as the Court deems proper.

Dated: February 7, 2025

LAW OFFICE OF SUSAN E. KAUFMAN, LLC

/s/ Susan E. Kaufman

Susan E. Kaufman, Esq. (DSBN 3381)
919 N. Market Street, Suite 460
Wilmington DE 19801
Telephone: (302) 472-7420
Facsimile: (302) 792-7420
Email: skaufman@skaufmanlaw.com

and

HANSON BRIDGETT LLP
Attn.: Nancy J. Newman, Esq.
425 Market Street, 26th Fl.
San Francisco, CA 94105
Telephone: (415) 777-3200
Email: nnewman@hansonbridgett.com

*Attorneys for Landlords, Granite Village West, L.P. and
Lynnwood Tower, LLC*